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13 *Attorneys for Plaintiff,*  
14 *Shannon Thompson*

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Shannon Thompson,

18 Plaintiff,

19 vs.

20 Experian Information Solutions, Inc.,  
21 an Ohio corporation.

22 Defendant.  
23  
24  
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27  
28

Case No.:

**COMPLAINT**

**JURY TRIAL DEMAND**

1  
2 NOW COMES THE PLAINTIFF, SHANNON THOMPSON, BY AND  
3 THROUGH COUNSEL, TRINETTE G. KENT, and for her Complaint against the  
4 Defendant, pleads as follows:  
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6 **JURISDICTION**

- 7 1. Jurisdiction of this court arises under 15 U.S.C. §1681p, 15 U.S.C. §1692k(d)  
8 and 28 U.S.C. §§1331,1337.  
9  
10 2. This is an action brought by a consumer for violation of the Fair Credit  
11 Reporting Act (15 U.S.C. §1681, *et seq.* [hereinafter “FCRA”]).  
12

13 **VENUE**

- 14  
15 3. The transactions and occurrences which give rise to this action occurred in the  
16 City of Mesa, Maricopa County, Arizona.  
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18 4. Venue is proper in the District of Arizona, Phoenix Division.

19 **PARTIES**

- 20  
21 5. The Defendant to this lawsuit is Experian Information Solutions, Inc.  
22 (“Experian”), which is an Ohio company that maintains a registered agent in  
23 Maricopa County, Arizona.  
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**GENERAL ALLEGATIONS**

6. On or about January 5, 2015, Plaintiff obtained her Experian credit file and noticed inaccuracies on the following trade lines (“Errant Trade Lines”):
- a. ARS Account Resolution, Account Number: 709284270000000000XXXX;
  - b. Barclays Bank, Account Number: 8421227XXXX;
  - c. Cap One, Account Number: 517805830901XXXX;
  - d. Cap One, Account Number: 6011381025144351XXXX;
  - e. Cap One, Account Number: 6206216676941001XXXX;
  - f. Medical Payment Data, Account Number: 5448582XXXX;
  - g. Medical Payment Data, Account Number: N33835XXXX;
  - h. Medical Payment Data, Account Number: S88285XXXX;
  - i. SYNCB Amazon, Account Number: 6045781014645112XXXX;
  - j. SYNCB Atir, Account Number: 601918007405XXXX;
  - k. SynCB Carcare One, Account Number: 6019183209163666XXXX;
  - l. Verizon, Account Number: 4710793030001XXXX;
  - m. Weisfield Jewelers, Account Number: 3097776351XXXX; and
  - n. USAA Savings Bank, Account Number: 5491237330660120XXXX.
7. On or about January 26, 2015, Mrs. Thompson submitted a letter to Experian, disputing the Errant Trade Lines.
8. On or about April 9, 2015, Mrs. Thompson received a letter from Experian, stating that it received a suspicious request and determined that it was not sent by Mrs. Thompson. Experian stated that it would not be initiating any disputes based on the suspicious correspondence and that it would apply this same policy to any future suspicious requests that it received.
9. Experian refused to investigate Mrs. Thompson’s dispute, in violation of the Fair Credit Reporting Act.

**COUNT I**

**NEGLIGENT VIOLATION OF THE FAIR CREDIT REPORTING ACT  
BY EXPERIAN**

10. Plaintiff realleges the above paragraphs as if recited verbatim.

11. Defendant Experian prepared, compiled, issued, assembled, transferred, published, and otherwise reproduced consumer reports regarding Mrs. Thompson as that term is defined in 15 USC 1681a.

12. Such reports contained information about Mrs. Thompson that was false, misleading, and inaccurate.

13. Experian negligently failed to maintain and/or follow reasonable procedures to assure maximum possible accuracy of the information it reported to one or more third parties pertaining to Mrs. Thompson, in violation of 15 USC 1681e(b).

14. After receiving Mrs. Thompson's consumer dispute to the Errant Trade Lines, Experian negligently failed to conduct a reasonable reinvestigation as required by 15 U.S.C. 1681i.

15. As a direct and proximate cause of Experian's negligent failure to perform its duties under the FCRA, Mrs. Thompson has suffered actual damages, mental anguish and suffering, humiliation, and embarrassment.

1 16.Experian is liable to Mrs. Thompson by reason of its violation of the FCRA in  
2 an amount to be determined by the trier fact together with her reasonable  
3 attorneys' fees pursuant to 15 USC 1681o.  
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5  
6 **WHEREFORE, PLAINTIFF PRAYS** that this court grant her a judgment  
7 against Experian for actual damages, costs, interest, and attorneys' fees.  
8

9 **COUNT II**

10 **WILLFUL VIOLATION OF THE FAIR CREDIT REPORTING ACT**  
11 **BY EXPERIAN**

12 17.Plaintiff realleges the above paragraphs as if recited verbatim.  
13

14 18.Defendant Experian prepared, compiled, issued, assembled, transferred,  
15 published, and otherwise reproduced consumer reports regarding Mrs.  
16 Thompson as that term is defined in 15 USC 1681a.  
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18 19.Such reports contained information about Mrs. Thompson that was false,  
19 misleading, and inaccurate.  
20

21 20.Experian willfully failed to maintain and/or follow reasonable procedures to  
22 assure maximum possible accuracy of the information that it reported to one or  
23 more third parties pertaining to Mrs. Thompson, in violation of 15 USC  
24 1681e(b).  
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1 21. After receiving Mrs. Thompson's consumer dispute to the Errant Trade Lines,  
2 Experian willfully failed to conduct a reasonable reinvestigation as required by  
3 15 U.S.C. 1681i.  
4

5 22. As a direct and proximate cause of Experian's willful failure to perform its  
6 duties under the FCRA, Mrs. Thompson has suffered actual damages, mental  
7 anguish and suffering, humiliation, and embarrassment.  
8

9 23. Experian is liable to Mrs. Thompson by reason of its violations of the FCRA in  
10 an amount to be determined by the trier of fact together with her reasonable  
11 attorneys' fees pursuant to 15 USC 1681n.  
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15 **WHEREFORE, PLAINTIFF PRAYS** that this court grant her a judgment  
16 against Experian for the greater of statutory or actual damages, plus punitive damages,  
17 along with costs, interest, and attorneys' fees.  
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19 **JURY DEMAND**

20 Plaintiff hereby demands a trial by Jury.  
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22

23 DATED: March 10, 2016

NITZKIN & ASSOCIATES

24  
25 By: /s/ Trinette G. Kent  
26 Trinette G. Kent  
27 Attorneys for Plaintiff,  
28 Shannon Thompson